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April 3, 2020

Via ECF

Honorable Rachel P. Kovner
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Chunn, et al. v. Edge*, No. 20 Civ. 1590

Dear Judge Kovner:

Along with the Cardozo Civil Rights Clinic and Alexander A. Reinert, this office represents Petitioners and the putative class in the above-captioned case. Pursuant to the Court's Order, the parties have been working for the past two days under the supervision of Judge Mann to attempt to resolve this matter.

Pursuant to the Court's Order, we write to advise the Court that discussions amongst the parties concluded at 10:00am today. We have not received further updates from Respondents regarding whether they will take the actions discussed with Judge Mann this morning with respect to the four named Petitioners.

In the event a settlement is not possible, we are submitting the enclosed supplemental declaration to address facts that have developed since the April 1, 2020 conference with Your Honor and issues raised at that conference.

Very truly yours,

/s/

Katherine Rosenfeld

c. All counsel (via ECF)